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 * Pro hac vice application pending

Attorneys for Proposed Amici Curiae
Asian American Legal Defense and Education Fund,
AAPI New Jersey, and
Asian Americans Advancing Justice | AAJC

UNITED STATES DISTRICT COURT
 DISTRICT OF NEW JERSEY

)	
)	Civ. No. 24-1098 (ZNQ) (TJB)
ANDY KIM, in his personal capacity as a)	
candidate for U.S. Senate, et al.,)	
)	
Plaintiffs,)	DECLARATION OF
)	NIYATI SHAH IN SUPPORT
v.)	OF MOTION FOR LEAVE
)	TO APPEAR AS AMICI
CHRISTINE GIORDANO HANLON,)	CURIAE
in her official capacity)	
as Monmouth County Clerk, et al.,)	
)	
Defendants.)	
)	
)	

NIYATI SHAH declares:

1. I am a member in good standing of the bar of this Court and the
 Director of Litigation for Asian Americans Advancing Justice | AAJC. I am counsel

of record for proposed *amici curiae* Asian American Legal Defense and Education Fund, AAPI New Jersey, and Asian Americans Advancing Justice | AAJC (together, “proposed *amici curiae*”).

2. I make this declaration to place before the Court certain documents and facts in support of proposed *amici curiae*’s motion for leave to appear as *amici curiae* (the “motion for leave”).

3. On March 7, 2024, counsel for proposed *amici curiae* contacted counsel for the parties seeking their consent to the motion for leave.

4. Counsel for Plaintiffs indicated that Plaintiffs consent to the motion for leave.

5. No Defendants consented to the motion for leave. Only one Defendant’s counsel provided an explanation for their non-consent. That message, from counsel for Defendant Ripa, is attached hereto as **Exhibit 1**.

6. Counsel for Defendants Durkin, Ireland-Imhof, and Rajoppi requested that proposed *amici curiae* share a draft of the proposed brief, which request proposed *amici curiae* declined. Counsel for Defendant Hanlon indicated that his client would not consent, but that he did not intend to file an objection to the motion for leave.

7. Other than foregoing, counsel for proposed *amici curiae* did not receive responses from counsel for the Defendants regarding our request for consent to the motion for leave.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 12, 2024 in Washington, D.C.

s/ Niyati Shah

Niyati Shah